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Attorneys for Defendants COUNTY OF SAN  
JOAQUIN, PATRICK WITHROW and FELIPE  
MENDOZA

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

ARMANDO SALGADO SR., an individual,  
and ARLINDA SALGADO, an individual,  
and as successor in interest to deceased  
ARMANDO ADAM SALGADO,

Plaintiffs,

v.

COUNTY OF SAN JOAQUIN; PATRICK  
WITHROW, an individual; FELIPE  
MENDOZA, an individual; and DOES 1 to10,  
inclusive,

Defendants.

Case No. 2:22-cv-01024-MCE-AC

**STIPULATION AND ORDER FOR  
LIMITED EXTENSION OF EXPERT  
DISCOVERY CUTOFF AND  
DISPOSITIVE MOTION CUTOFF TO  
ALLOW FOR PRIVATE MEDIATION  
BEFORE THE HON. KENDALL J.  
NEWMAN (RET.)**

Judge: Morrison C. England, Jr.

Trial Date: N/A

Pursuant to Local Rules 143 and 144, subdivisions (a) and (d), Defendants COUNTY OF  
SAN JOAQUIN, FELIPE MENDOZA, and PATRICK WITHROW (collectively “County  
Defendants”) and Plaintiffs ARMANDO SALGADO, SR. and ARLINDA SALGADO (collectively  
“Plaintiffs”), hereby stipulate as follows:

WHEREAS, the Expert Discovery Cutoff in the instant action is April 27, 2024 (Dkt No.  
20);

WHEREAS, the Dispositive Motion Filing Cutoff in the instant action is June 5, 2024

1 (*Ibid.*);

2 WHEREAS, the parties have agreed to private mediation with the Hon. Kendall J.  
3 Newman (Ret.) on April 8, 2024;

4 WHEREAS, the parties agree that alternative dispute resolution efforts with Judge  
5 Newman should be exhausted prior to the commencement of expert discovery and the preparation  
6 and filing of dispositive motion practice so as to potentially conserve judicial resources;

7 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiffs and  
8 County Defendants, through their respective counsel, that the Expert Discovery Cutoff of April  
9 27, 2024, shall be extended to June 12, 2024, and, that the Dispositive Motion Cutoff shall be  
10 extended to July 22, 2024. All other dates shall remain as scheduled.

11 Dated: March 5, 2024

BURKE, WILLIAMS & SORENSEN, LLP

12  
13 By: /s/ Christopher E. Brumfiel

14 Gregory B. Thomas  
15 Christopher E. Brumfiel  
16 Attorneys for Defendants  
17 COUNTY OF SAN JOAQUIN, PATRICK  
18 WITHROW, and FELIPE MENDOZA

19  
20 Dated: March 5, 2024

O'HARA LAW APC

21 By: /s/ Kevin O'Hara

22 Kevin W. O'Hara  
23 Attorneys for Plaintiffs  
24 ARMANDO SALGADO SR. and  
25 ARLINDA SALGADO

26  
27 Dated: March 5, 2024

LAW OFFICE OF CLAUDIA C.  
BOHORQUEZ

28 By: /s/ Claudia C. Bohorquez

Claudia C. Bohorquez  
Attorneys for Plaintiffs  
ARMANDO SALGADO SR. and  
ARLINDA SALGADO

**SIGNATURE ATTESTATION**

In accordance with Local Rule 131(e) I, Christopher E. Brumfiel, attest that I have obtained authorization in the filing of this document from the other signatories listed above.

**By:** /s/ Christopher E. Brumfiel

**ORDER**

Based on the Parties' stipulated request and good cause appearing, IT IS ORDERED THAT by and between Plaintiffs and County Defendants, through their respective counsel, that the Expert Discovery Cutoff of April 27, 2024, shall be extended to June 12, 2024, and, that the Dispositive Motion Cutoff shall be extended to July 22, 2024. All other dates shall remain as scheduled.

IT IS SO ORDERED.

Dated: March 14, 2024

  
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MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE